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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

STIPULATED REQUEST AND [PROPOSED] ORDER
TO ENLARGE TIME FOR THE PARTIES TO FILE
DISPOSITIVE MOTIONS AND TO CONTINUE THE
DEADLINE FOR HEARING DISPOSITIVE MOTIONS

3:10-CV-05154-MEJ

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-2 Plaintiff Jane Doe¹ (“Plaintiff”) and
2 Defendants Giuseppe Penzato and Kesia Penzato (“Defendants”), by and through their respective
3 counsel of record, hereby submit this stipulated request to enlarge time for the parties to file,
4 serve, and notice any dispositive motions and to continue the deadline for hearing dispositive
5 motions:

6 WHEREAS Plaintiff filed her Complaint on November 12, 2010;

7 WHEREAS the parties previously stipulated that Defendants would have until March 29,
8 2011 to answer or respond to Plaintiff’s Complaint;

9 WHEREAS the parties previously stipulated and this Court ordered that Plaintiff would
10 have until April 29, 2011 to file any motions responsive to Defendants’ Answer previously due
11 on April 22, 2011;

12 WHEREAS by Order dated April 14, 2011 this Court set December 1, 2011 and January
13 5, 2012, respectively, as the deadlines for the parties’ dispositive motions, and this Court’s
14 hearing on those motions;

15 WHEREAS Plaintiff’s counsel has a previously scheduled arbitration hearing in
16 December 2011 that conflicts with these deadlines;

17 WHEREAS extending these deadlines by six weeks will alter the dates regarding the
18 parties’ dispositive motions, but will not alter the date of any other event or deadline already
19 fixed by this Court;

20 NOW, THEREFORE, the undersigned parties, through their respective counsel, hereby
21 stipulate and agree as follows:

22 1. All dispositive motions shall be filed, served, and noticed by January 12, 2012, or
23 some later date as is convenient for the Court.

24
25 _____
26 ¹ The parties acknowledge that Defendants’ agreement to Plaintiff’s use of “Jane Doe” in this
27 filing in no way constitutes Defendants’ consent to Plaintiff proceeding under a pseudonym in
this litigation, nor have Defendants waived any argument that they may have to oppose
Plaintiff’s Motion for a Protective Order.

1 2. The January 5, 2012 deadline for hearing dispositive motions shall be removed
2 from the calendar and continued until February 16, 2012, or some later date as is convenient for
3 the Court.

4 3. Deadlines for any Opposition or Reply motions will be set in accordance with the
5 Civil Local Rules and the Federal Rules of Civil Procedure.

7 || Dated: April 29, 2011

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13 BUCHALTER NEMER
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Mia S. Blackler

Attorneys for Defendants
GIUSEPPE PENZATO and KESIA
PENZATO

ORDER

21 PURSUANT TO STIPULATION, IT IS SO ORDERED that all dispositive motions shall
22 be filed, served, and noticed by January 12, 2012. The Court shall hear dispositive motions
23 on February 16, 2012 at 10:00 a.m.

25 DATED: May 2, 2011

The Honorable Maria-Elena James
United States Magistrate Judge

STIPULATED REQUEST AND [PROPOSED] ORDER
TO ENLARGE TIME FOR THE PARTIES TO FILE
DISPOSITIVE MOTIONS AND TO CONTINUE THE
DEADLINE FOR HEARING DISPOSITIVE MOTIONS

DECLARATION OF CONSENT

Pursuant to General Order 45, the undersigned certifies that concurrence in the filing of this document was obtained from each of the other signatories.

Dated: April 29, 2011

By: s/Caroline Wilson
Caroline Wilson